In my opinion the ARRL is trying to complicate something the FCC simplified a few years back. There are a few changes which should be made to the rules which I will outline below but the radical changes proposed by the ARRL will create a nightmare.

- (1.) Make the Advanced Class licensee's Amateur Extras. Require no testing and no issuance of new paper licenses. Just make the existing Advanced equal to Extra and only issue new paper at renewal time.
- (2.) Make the 5 WPM code CSCE good for as long as a Technician holds a valid Amateur License. The current expiration after 365 days makes no sense. The code doesn't change in the same fashion as the written exam might. Letting the written CSCE expire after 365 days does make sense for it but not for the code.
- (3.) Give the Technician class some very limited voice privileges on HF without the Morse Code requirement. There is no need to create a "novice" class as the ARRL proposes. Current Technicians should earn the upgrade to General Class. It shouldn't be bestowed on them.
- (4.) Leave the current General and Extra classes alone. Leave the 5 WPM code requirement in place. The General Class portion of the ham bands are overcrowded as it is, we don't need thousands of new, free, upgrades on them.

The testing process is fine. The only other changes you should consider may involve more spectrum for HF voice as there is an overcrowding problem as mentioned above.

These simple changes to the rules would keep the license structure simple, produce a minimum burden on the FCC, and correct some problems with the current system without creating more serious problems and dissent among the Amateur community. Please consider this common sense comments.

THANK YOU